

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

GRAND STRAND WATER & SEWER
AUTHORITY, on behalf of itself and all
others similarly situated,

Plaintiff,

vs.

OLTRIN SOLUTIONS, LLC, JCI JONES
CHEMICALS, INC., and TRINITY
MANUFACTURING, INC.,

Defendants.

Case No. 4:14-CV-2800-RMG

**PLAINTIFF'S MOTION FOR AN AWARD OF ATTORNEYS'
FEES, REIMBURSEMENT OF EXPENSES AND CLAIMS
ADMINISTRATION COSTS AND EXPENSES, AND FOR
A SERVICE AWARD TO THE CLASS REPRESENTATIVE**

Plaintiff, through Class Counsel, hereby moves for an award of attorneys' fees, for reimbursement of the costs and litigation expenses incurred by Plaintiff's Counsel and claims administration costs and expenses, and for payment of a service award to the class representative.

The grounds of this motion are fully set forth in the accompanying Memorandum of Law, the Declarations of Plaintiffs' Counsel Henrietta U. Golding, Pamela A. Markert, Brent W. Johnson, and Daniel C Hedlund, along with the Declaration of Ross Murray of the Court-appointed Claims Administrator, and the Exhibits attached to the Declarations, which are incorporated by reference herein and made a part hereof.

January 29, 2016

Respectfully submitted,

s/Henrietta U. Golding

Henrietta U. Golding, Fed ID# 2125

McNair Law Firm, P.A.

2411 N. Oak Street, Suite 206 (29577)

Post Office Box 336

Myrtle Beach, SC 29578-0336

Tel: (843) 444-1107

hgolding@mcnair.net

Solomon B. Cera

Pamela A. Markert

Cera LLP

595 Market Street, Suite 2300

San Francisco, CA 94105-2835

Tel: (415) 977-2230

scera@cerallp.com

pmarkert@cerallp.com

Brent W. Johnson

Emmy L. Levens

Hiba Hafiz

Cohen Milstein Sellers & Toll PLLC

1100 New York Ave. NW

Suite 500, West Tower

Washington, DC 20005

Telephone: (202) 408-4600

bjohnson@cohenmilstein.com

elevens@cohenmilstein.com

hhafiz@cohenmilstein.com

Daniel E. Gustafson

Daniel C. Hedlund

Gustafson Gluek, PLLC

Canadian Pacific Plaza

120 South Sixth Street, Suite 2600

Minneapolis, MN 55402

Tel: (612) 333-8844

dgustafson@gustafsongluek.com

dhedlund@gustafsongluek.com

*Attorneys for Plaintiff Grand Strand Water
Authority and the Proposed Settlement Class*